

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION  
This Document Relates to Plaintiff  
Stacy Miller  
2:17-cv-00395-DGC

No. MD-15-02641-PHX-DGC

**AMENDED MASTER SHORT FORM  
COMPLAINT FOR DAMAGES FOR  
INDIVIDUAL CLAIMS AND JURY  
DEMAND**

Plaintiff(s) named below, for their Complaint against Defendants named below,  
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Stacy Miller (Deceased)

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
consortium claim:

N/A

3. Other Plaintiff and capacity (i.e. administrator, executor, guardian,  
conservator):

Ashley Marshall, as Administrator of the Estate of Stacy Miller, Deceased

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
the time of implant:

Stacy Miller (Deceased) - Kentucky

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
the time of injury:

Stacy Miller (Deceased) - Ohio

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Stacy Miller (Deceased) - N/A; Ashley Marshall - Ohio

- 1       7.     District Court and Division in which venue would be proper absent direct  
2             filing:  
3             United States District Court, Eastern District of Kentucky
- 4       8.     Defendants (check Defendants against whom Complaint is made):  
5             ☒ C.R. Bard Inc.  
6             ☒ Bard Peripheral Vascular, Inc.
- 7       9.     Basis of Jurisdiction:  
8             ☒ Diversity of Citizenship  
9             ☐ Other: \_\_\_\_\_  
10            ☐ Other allegations of jurisdiction and venue not expressed in Master  
11            Complaint:  
12            \_\_\_\_\_  
13            \_\_\_\_\_  
14            \_\_\_\_\_
- 15      10.    Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is (are) making  
16            a claim (check applicable Inferior Vena Cava Filter(s)):  
17            ☐ Recovery<sup>®</sup> Vena Cava Filter  
18            ☐ G2<sup>®</sup> Vena Cava Filter  
19            ☐ G2<sup>®</sup> Express (G2<sup>®</sup> X) Vena Cava Filter  
20            ☐ Eclipse<sup>®</sup> Vena Cava Filter  
21            ☐ Meridian<sup>®</sup> Vena Cava Filter  
22            ☐ Denali<sup>®</sup> Vena Cava Filter  
23            ☒ Other: Bard
- 24      11.    Date of implantation as to each product:  
25            04/05/07  
26            \_\_\_\_\_
- 27      12.    Counts in the Master Complaint brought by Plaintiff(s):  
28            ☒ Count I:     Strict Products Liability – Manufacturing Defect

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☒ Yes

☐ No



**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of May 2018 I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

Ben C. Martin

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